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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**  
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18 *In re J&J Investment Litigation*

Case No.: 2:22-cv-00529-GMN-NJK

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20 GEOFF WINKLER, as court-appointed  
receiver for J&J Consulting Services, Inc., an  
21 Alaska corporation; J&J Consulting Services,  
Inc., a Nevada corporation; and J and J  
22 Purchasing LLC, Florida limited liability  
company,

Case No.: 2:23-cv-00703-GMN-NJK

**STIPULATION AND ~~[PROPOSED]~~  
ORDER REGARDING BRIEFING  
SCHEDULE**

23 Plaintiff,

24 v.

25 WELLS FARGO BANK, N.A.,

26 Defendant.  
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Pursuant to LR 7-1, LR IA 6-1, and LR IA 6-2, Plaintiffs in the above-captioned actions (“Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) (collectively, the “Parties”) jointly stipulate concerning Plaintiffs’ Motion to Compel (ECF No. 148, Case No. 2:22-cv-00529 (“Class Action”); ECF No. 72, Case No. 2:23-cv-00703 (“Receiver Action”)) (“Motion to Compel”) and Motion to Redact (ECF No. 147, Case No. 2:22-cv-00529; ECF No. 73, Case No. 2:23-cv-00703) (“Motion to Redact”; collectively, with the Motion to Compel, the “Motions”) filed on October 2 and October 3, 2024 as follows:

WHEREAS, on October 2 and October 3, 2024, Plaintiffs filed the Motion to Compel in the Class Action and the Receiver Action, respectively;

WHEREAS, on October 2 and October 3, 2024, Plaintiffs filed an associated Motion to Redact in the Class Action and the Receiver Action, respectively<sup>1</sup>;

WHEREAS, Wells Fargo’s response to Plaintiffs’ Motion to Compel is currently due on October 16, 2024;

WHEREAS, Wells Fargo requests an extension of time to respond to the Motion to Compel up to and including October 23, 2024, on the basis of the following: (1) Plaintiffs’ Motion to Compel places at issue approximately twenty discovery requests served by the Plaintiffs in each action, outlining more than seven issues, and including more than a thousand of pages of exhibits in support, some of which have been filed under seal [*see* Motion to Compel]; (2) During the month of October, there are five depositions scheduled to take place that require significant time and preparation, including travel, as well as the deadline for disclosure of expert reports; and (3)

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<sup>1</sup> The Parties dispute when Wells Fargo’s response to Plaintiffs’ Motion to Redact is currently due given the content of the Motion to Redact. Plaintiffs interpret the Court’s orders to provide that Wells Fargo’s response to Plaintiffs’ Motion to Redact is currently due today, on October 9, 2024 (*see* ECF No. 57 at 2, Case No. 2:22-cv-00529). Wells Fargo contends that its response to Plaintiffs’ Motion to Redact is due on October 16, 2024, since the time limitations set forth in the Court’s Order (ECF. 57) are not applicable. Specifically, Wells Fargo believes ECF No. 57 does not apply since (1) Plaintiffs filed the Motion to Redact based on Wells Fargo’s confidentiality designations *and* Matthew Beasley’s confidentiality designations, and (2) all Parties have an equal obligation to keep sensitive personally identifiable information (PII), like social security numbers, under seal (*see* ECF No. 57 at 2, Case No. 2:22-cv-00529). Thus, Wells Fargo’s confidentiality designations are not the “sole ground for the motion to seal.” Nonetheless, out of an abundance of caution, Wells Fargo is responding to the Motions to Redact today.

The discovery sought to be compelled is wide ranging and follows extensive meet and confer conversations that took place over multiple months in some cases;

WHEREAS, Plaintiffs, without conceding the accuracy of Wells Fargo's characterizations, do not object to the extension of time to respond, provided that their reply deadline to the Motion to Compel be extended 3 business days up to and including November 4, 2024, so that the reply deadline not fall on a day consecutive to the deadline for expert disclosures, which currently is scheduled for October 31, 2024 (*see* ECF No. 138, Case No. 2:22-cv-00529; ECF No. 52, Case No. 2:23-cv-00703);

WHEREAS, this is the first stipulation for extension of time to file opposition and reply briefs related to the Motion to Compel;

WHEREAS, the Parties reached this stipulation in good faith in order to provide sufficient time to appropriately present their positions to this Court and not for purposes of delay.

NOW THEREFORE, the parties stipulate as follows, subject to the Court's approval:

The briefing schedule concerning the Motion to Compel be as follows:

	Current Deadline	New Deadline
1. Wells Fargo's Opposition to Plaintiffs' Motion to Compel	October 16, 2024	October 23, 2024
2. Plaintiffs' Reply in Support of the Motion to Compel	October 23, 2024	November 4, 2024

Dated: October 9, 2024

IT IS SO ORDERED.

Dated: October 10, 2024

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Nancy J. Köppe  
United States Magistrate Judge

By: /s/ Miles Clark  
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